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March 18, 2019

Magistrate Judge Ramon E. Reyes, Jr.  
United States District Court, EDNY  
225 Cadman Plaza East Rm N208  
Brooklyn NY 11201

Re: *Rodriguez, et al. v. DeVos, et al.*, 16 CV 5476 (NGG) (RER);

Dear Magistrate Reyes,

Counsel for Plaintiffs and Defendants write jointly to request a 21 day extension to submit a stipulation of dismissal. This is the fourth request for such an extension. The request will not affect other deadlines in this matter.

The request is needed because Kathy Liriano, one of the Plaintiffs, could not be located until March 15, 2019, despite numerous letters, phone calls, overnight mails, and even a personal visit to her home. Ms. Liriano has since provided information needed to settle the case. The parties believe three weeks are needed to obtain signatures needed to finalize the agreement.

On September 21, 2018, the parties informed the court that they had agreed in principle to resolve the matters without further judicial intervention, but needed time to finalize certain outstanding issues. The Court ordered the parties to submit a stipulation of dismissal by November 21, 2018. On November 21, 2018 the parties jointly requested an additional 30 days to finalize their agreement and submit a stipulation of dismissal. The Court granted that request and ordered the parties to submit a stipulation of dismissal by December 21, 2018. Although the parties continued to make progress, an outstanding issue came to light in December resulting in a second request for 30 days to finalize the agreement. Your Honor granted that request with an order to submit the stipulation of dismissal by January 21, 2019.

The government shut-down that began on December 21, 2018 prevented the parties from working on the outstanding issue, resulting in a third request for an extension of time in January 2019. Your honor granted that request and ordered the filing of a stipulation of dismissal within 30 days of the shut down's end, which occurred on January 25, 2019. Thereafter, Your Honor extended the deadline to March 18, 2019.

**Meghan Faux, Project Director,  
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As mentioned earlier, some of the relief sought by Plaintiffs has been implemented. This includes a new pre-offset notice from Treasury that advises Social Security recipients owing student loans that they can stop the offset by applying for and receiving a total and permanent disability discharge.

Sincerely,

-S-

Johnson M. Tyler

Foreclosure and Consumer Attorney

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cc: AUSA Matthew Mailloux